

1 BARRY J. PORTMAN  
Federal Public Defender  
2 NICHOLAS P. HUMY  
Assistant Federal Public Defender  
3 160 West Santa Clara Street, Suite 575  
San Jose, CA 95113  
4 Telephone: (408) 291-7753  
5 Counsel for Defendant DANIEL THOMAS REYES

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7  
8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA, ) No. CR-07-00772-JF  
11 )  
Plaintiff, )  
12 ) **STIPULATION TO CONTINUE**  
vs. ) **STATUS HEARING; [PROPOSED]**  
13 ) **ORDER**  
DANIEL THOMAS REYES, )  
14 )  
Defendant. )  
15 \_\_\_\_\_)

16 Defendant and the government, through their respective counsel, hereby stipulate that,  
17 subject to the court's approval, the status hearing date in the above-captioned matter, presently  
18 scheduled for Wednesday, April 30, 2008 at 9:00 a.m., be continued to Wednesday, May 21,  
19 2008 at 9:00 a.m. Defense counsel is requesting the continuance for effective preparation and to  
20 allow time to resolve this matter.

21 The defense has recently received more discovery and resolution discussions are  
22 promising and ongoing.

23 The parties further agree and stipulate that time should be excluded from and including  
24 April 30, 2008 through and including May 21, 2008 for effective preparation of defense counsel,  
25 pursuant to Speedy Trial Act, 18 U.S.C. §3161(h)(8)(A) and (B)(iv). Accordingly, the United

26 No. CR-07-70670-HRL

1 States and the defendant agree that granting the requested exclusion of time will serve the interest  
2 of justice and outweigh the interest of the public and defendant in a speedy trial.

3 Dated: April 29, 2008

\_\_\_\_\_/s/\_\_\_\_\_  
NICHOLAS P. HUMY  
Assistant Federal Public Defender

5 Dated: April 29, 2008

\_\_\_\_\_/s/\_\_\_\_\_  
JOHN GLANG  
Assistant United States Attorney

8  
9 **ORDER**

10 GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the hearing date  
11 presently set for Wednesday, April 30, 2008 will be continued to May 21, 2008 at 9:00a.m.

12 IT IS FURTHER ORDERED, that the time between April 30, 2008 through and  
13 including May 21, 2008, shall be excluded for effective preparation of defense counsel, pursuant  
14 to Speedy Trial Act, 18 U.S.C. §3161(h)(8)(A) and (B)(iv).

15 Dated: \_\_\_\_\_, 2008

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JEREMY FOGEL  
United States District Judge

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26 No. CR-07-70670-HRL